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JPMorgan Chase Bank, N.A., as successor
by merger to Chase Home Finance LLC, as
successor by merger to Chase Manhattan
Mortgage Corp. and Federal Home Loan Mortgage Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEVEN and SYLVIA STAUFFER, on behalf of
herself and all others similarly situated,

Plaintiffs,

vs.

CHASE HOME FINANCE, LLC; CHASE
MANHATTAN MORTGAGE CORP.,
COOPER CASTLE LAW FIRM; and FEDERAL
HOME LOAN MORTGAGE CORP.,

Defendants.

CASE NO. 2:11-CV-01155-PMP-GWF

**PARTIES JOINT STATUS REPORT
AND STIPULATION AND
[PROPOSED] ORDER TO STAY ALL
LITIGATION AND DISCOVERY
PROCEEDINGS FOR 45 DAYS
PENDING SETTLEMENT
NEGOTIATIONS**

1 Defendants JPMorgan Chase Bank, N.A., as successor by merger to Chase Home Finance
2 LLC, as successor by merger to Chase Manhattan Mortgage Corp. ("Chase"), Federal Home Loan
3 Mortgage Corporation ("Freddie Mac"), and The Cooper Castle Law Firm ("Cooper Castle")
4 (collectively, "Defendants"), and Plaintiffs Steven Stauffer and Sylvia Stauffer ("Plaintiffs")
5 (Defendants and Plaintiffs collectively referred to as "the Parties"), hereby submit this Joint
6 Status Report to provide the Court with an update regarding the status of these proceedings and,
7 in particular, the Parties' efforts toward achieving a settlement of the claims at issue therein.
8 Further, in light of the ongoing good faith settlement discussions, the Parties hereby stipulate to
9 and respectfully request that this Court grant a forty-five (45) day stay of all litigation and
10 discovery proceedings herein so that the Parties may continue to focus their efforts on achieving a
11 resolution of this matter outside of litigation. As grounds for this stipulated stay of proceedings,
12 the Parties submit the following:

13 1. This Court entered its Scheduling Order on May 15, 2012 (the "Order"), setting a
14 discovery cut-off deadline of December 31, 2012.

15 2. Since that time, the Parties have each served their initial disclosures pursuant to
16 Fed. R. Civ. P. 26(a)(1), and Plaintiffs have propounded interrogatories and requests for
17 production of documents upon each of the Defendants.

18 3. The Parties have and continue to work in good faith to make reasonable
19 accommodations to their respective obligations under the Order. However, the Parties are
20 currently engaged in good faith settlement negotiations which may result in dismissal of all
21 claims asserted herein. Accordingly, on October 16, 2012, the Parties met and conferred
22 regarding the timing of their respective obligations under the Order and agreed to extend the
23 deadlines to respond to their written discovery requests and seek a forty-five (45) day stay of all
24 pre-trial dates and deadlines while settlement discussions continue.

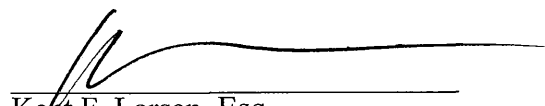
25 4. In light of the ongoing settlement negotiations, the Parties believe that good cause
26 exists to grant a forty-five (45) day stay of all proceedings herein. This request is not made for
27 the purposes of delay. Instead, the Parties agree and acknowledge that a temporary stay of all
28 proceedings herein will serve the interests of judicial economy and may allow the Parties to

1 resolve this lawsuit without incurring unnecessary additional fees and costs. *See, e.g.,*
 2 *Mediterranean Enterprises, Inc. v. Ssangyong Corp.*, 708 F.2d 1458, 1465 (9th Cir. 1983)
 3 (temporary stay of proceedings applicable to preserve judicial efficiency and fairness).

4 5. Accordingly, the Parties respectfully request that this Court grant the Parties a stay
 5 of litigation and discovery proceedings in this action for forty-five (45) days from the date the
 6 Court enters its order approving this stipulation.

7
 8 DATED this 29 day of October, 2012. DATED this _____ day of October, 2012.

9 SMITH LARSEN & WIXOM

10 
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 17 and
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 23 Long Beach, California 90801-1730
 24 Attorneys for Defendants
 25 JPMorgan Chase Bank, N.A., as successor
 26 by merger to Chase Home Finance LLC, as
 27 successor by merger to Chase Manhattan
 28 Mortgage Corp., and Federal National
 Mortgage Corporation

See attached
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 Las Vegas, NV 89101
 and
 Paul Grobman, Esq. (*pro hac vice*)
 555 5th Ave., 17th Floor
 New York, NY 10017
 Attorneys for Plaintiffs

21 DATED this _____ day of October, 2012

22 LEWIS BRISBOIS BISGAARD & SMITH
 23 LLP

24 See attached
 25 Josh Cole Aiklen, Esq.
 26 Nevada Bar No. 7254
 27 Mark J. Brown, Esq.
 28 Nevada Bar No. 3687
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 Attorneys for Defendant
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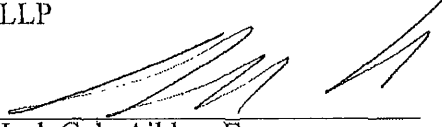
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DATED this 26 day of October, 2012.

LEWIS BRISBOIS BISGAARD & SMITH
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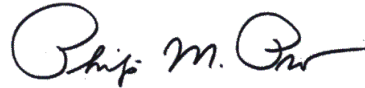
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Attorneys for Plaintiffs

IT IS SO ORDERED:

A handwritten signature in black ink, appearing to read "Philip M. Pro". The signature is written in a cursive, flowing style.

PHILIP M. PRO, U.S. DISTRICT JUDGE

DATED: _ October 29, 2012. _____

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